

# EXHIBIT A



## Service of Process Transmittal Summary

**TO:** Laura Aznavoorian, Litigation Supervisor  
Gallagher Bassett Services, Inc.  
1901 S. Meyers Rd, Suite 200C  
Oakbrook Terrace, IL 60181

**RE:** Process Served in California

**FOR:** Costco Wholesale Membership, Inc. (Domestic State: CA)

### ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

**TITLE OF ACTION:** Re: LEILA CORDERO // To: Costco Wholesale Membership, Inc.

**CASE #:** 22STCV22422

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**PROCESS SERVED ON:** C T Corporation System, GLENDALE, CA

**DATE/METHOD OF SERVICE:** By Process Server on 07/15/2022 at 10:13

**JURISDICTION SERVED:** California

**ACTION ITEMS:** CT has retained the current log, Retain Date: 07/15/2022, Expected Purge Date: 07/30/2022

Image SOP

Email Notification, Laura Aznavoorian laura\_aznavoorian@gbtpa.com

Email Notification, Zois Johnston zjohnston@costco.com

Email Notification, Maureen Papier maureen\_papier@gbtpa.com

**REGISTERED AGENT CONTACT:** C T Corporation System  
330 N BRAND BLVD  
STE 700  
GLENDALE, CA 91203  
866-665-5799  
SouthTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



## PROCESS SERVER DELIVERY DETAILS

**Date:** Fri, Jul 15, 2022  
**Server Name:** Ken Khalatian

Entity Served	COSTCO WHOLESALE MEMBERSHIP, INC.
Case Number	22 STCV 22422
Jurisdiction	CA

Inserts		



Electronically FILED by Superior Court of California, County of Los Angeles on 07/12/2022 09:02 PM Sherri R. Carter, Executive Officer/Clerk of Court, by N. Alvarez, Deputy Clerk  
22STCV22422

SUM-100

**SUMMONS**  
**(CITACION JUDICIAL)**

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:**  
**(AVISO AL DEMANDADO):**

COSTCO WHOLESALE MEMBERSHIP, INC. and DOES 1 TO 25

**YOU ARE BEING SUED BY PLAINTIFF:**  
**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**  
LEILA CORDERO

**NOTICE:** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es): LOS ANGELES COUNTY SUPERIOR COURT  
111 N. Hill Street, Los Angeles, CA 90012  
Stanley Mosk Courthouse

CASE NUMBER: (Número del Caso):

22STCV22422

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: (El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Ameer Shah, Esq. / LAW OFFICES OF AMEER SHAH, 425 E. Colorado Street, #540, Glendale, CA 91205; 818-956-9300

DATE: 07/12/2022 Sherri R. Carter Executive Officer/Clerk of Court N. Alvarez, Deputy  
(Fecha) (Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)



**NOTICE TO THE PERSON SERVED:** You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):  
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)  
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)  
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)  
☐ other (specify):
4. ☐ by personal delivery on (date):

**PLD-PI-001**

1. Plaintiff (name or names): LEILA CORDERO

**2. This pleading, including attachments and exhibits, consists of the following number of pages:**

3. Each plaintiff named above is a competent adult

a. ☐ except plaintiff (name):

- (1) ☐ a corporation qualified to do business in California  
 (2) ☐ an unincorporated entity (*describe*):  
 (3) ☐ a public entity (*describe*):  
 (4) ☐ a minor ☐ an adult  
     (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed  
     (b) ☐ other (*specify*):  
 (5) ☐ other (*specify*):

b. ☐ except plaintiff (name):

- (1) ☐ a corporation qualified to do business in California  
 (2) ☐ an unincorporated entity (*describe*):  
 (3) ☐ a public entity (*describe*):  
 (4) ☐ a minor ☐ an adult  
     (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed  
     (b) ☐ other (*specify*):  
 (5) ☐ other (*specify*):

☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

PLD-PI-001

SHORT TITLE: CORDERO vs. COSTCO

CASE NUMBER:

4. ☐ Plaintiff (name):

is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

## 5. Each defendant named above is a natural person

a. ☒ except defendant (name):

COSTCO WHOLESALE MEMBERSHIP, INC.

(1) ☐ a business organization, form unknown(2) ☒ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):c. ☐ except defendant (name):(1) ☐ a business organization, form unknown(2) ☐ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):b. ☐ except defendant (name):(1) ☐ a business organization, form unknown(2) ☐ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):d. ☐ except defendant (name):(1) ☐ a business organization, form unknown(2) ☐ a corporation(3) ☐ an unincorporated entity (describe):(4) ☐ a public entity (describe):(5) ☐ other (specify):☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

## 6. The true names of defendants sued as Does are unknown to plaintiff.

a. ☒ Doe defendants (specify Doe numbers): 1-11 were the agents or employees of other named defendants and acted within the scope of that agency or employment.b. ☒ Doe defendants (specify Doe numbers): 12-25 are persons whose capacities are unknown to plaintiff.7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):

## 8. This court is the proper court because

a. ☐ at least one defendant now resides in its jurisdictional area.b. ☐ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.d. ☐ other (specify):9. ☒ Plaintiff is required to comply with a claims statute, anda. ☒ has complied with applicable claims statutes, orb. ☐ is excused from complying because (specify):

PLD-PI-001

SHORT TITLE: CORDERO vs. COSTCO

CASE NUMBER:

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☐ Motor Vehicle
- b. ☐ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☒ Premises Liability
- f. ☒ Other (specify): Negligence under California Civil Code Sec 1714.

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☐ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☐ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (specify): According to proof. Cost of suit herein and any other cost the court deems just and proper.

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
  - (2) ☐ punitive damages
- The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):
- (1) ☒ according to proof
  - (2) ☐ in the amount of: \$


15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

- 1. Premises Liability and 2. Negligence under California Civil Code Sec 1714.
- Premises Liability

Date: July 11, 2022

AMEER A. SHAH

(TYPE OR PRINT NAME)

► 

(SIGNATURE OF PLAINTIFF OR ATTORNEY)

PLD-PI-001(2)

SHORT TITLE: CORDERO vs. COSTCO

CASE NUMBER:

FIRST

## CAUSE OF ACTION—General Negligence

Page 4

(number)

ATTACHMENT TO ☒ Complaint ☐ Cross - Complaint

(Use a separate cause of action form for each cause of action.)

GN-1. Plaintiff (name): LEILA CORDERO

alleges that defendant (name):

COSTCO WHOLESALE MEMBERSHIP, INC. and

☒ Does 1 to 25

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff

on (date): July 15, 2020

at (place): 340 Lakewood Center Mall, Lakewood, CA 90712

(description of reasons for liability):

Defendants, and each of them, so negligently, carelessly and unlawfully, failed to maintain, clean, repair, inspect seating area and protect general public, causing risk of injuries to Plaintiff. That on July 15, 2020 at approximately 1:30 p.m., Plaintiff was sitting at the outdoor tables at COSTCO at 340 Lakewood Center Mall, Lakewood, CA 90712 when all of a sudden the wind caused an umbrella from another table to lift up and fly toward Plaintiff and hit her in the back, causing serious injury and pain to Plaintiff.

Defendant failed to properly maintain and/or warn of the umbrellas which resulted in injuries to Plaintiff.

Plaintiff suffered and continues to suffer severe bodily injuries to her back and spine and other damages in connection therewith. As a result of the incident Plaintiff has accumulated medical expenses due to this incident.

Defendants' negligent conduct was the proximate cause of injuries and resulting damage to Plaintiff, as identified under Civil Code Section 1714.

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**SECOND CAUSE OF ACTION: PREMISES LIABILITY**

That on or about July 15, 2020, at approx. 1:30 p.m. Plaintiff was sitting at some outdoor tables at COSTCO, located at 340 Lakewood Center Mall, Lakewood, CA 90712 when all of a sudden the wind caused an umbrella from another table to lift up and fly toward Plaintiff and hit her in the back, causing extreme pain and serious injury to Plaintiff.

At the time of the incident, Defendants, and each of them, owned, maintained, possessed or controlled, the premises located at 340 Lakewood Center Mall, Lakewood, CA 90712. Defendants had total control over the maintenance, repair and upkeep of the said premises and had a duty to maintain the premises and keep it safe for use of the general public.

At the time of the incident, which is the subject of this action, the defendants failed to maintain the premises and make it safe to the general public. Neither defendants, owners nor the maintenance staff did anything to prevent the umbrella from lifting up and flying toward Plaintiff and hitting her in the back, causing extreme pain and injury to Plaintiff.

Defendant owned, rented, operated, controlled, entrusted the premises which was in a dangerous condition. Further, the defendants failed to warn the general public about the umbrellas and that the premises was unsafe and/or that there was a dangerous condition in the seating area.

Furthermore, defendants, and each of them, failed to make sure that the general public had notification of the unsafe and dangerous condition. There were no warning signs alerting the general public about the dangerous condition on said premises.

Defendants, and each of them, knew, or in the exercise of reasonable care and diligence, should have known of the dangerous and unsafe condition existing at said premises.

Defendants, and Does 1 to 25, negligently, carelessly and recklessly inspected the outdoor seating area and premises or omitted to inspect the dangerous condition existing at the outdoor seating area and to warn the general public of the existing danger. As such, defendants, breached their duty of care owed to the general public.

SECOND CAUSE OF ACTION

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As a direct and proximate result of the defendants' and each of their negligence, Plaintiff suffered and continues to suffer extreme pain and injuries, all to the plaintiff's special and general damages according to proof.

SECOND CAUSE OF ACTION